

**REMARKS/ARGUMENTS**

Claims 1-14 and 16-43 are pending. Claim 15 has been canceled without prejudice and without disclaimer. Claims 1, 17, 28, 30, 31, 33, 41, and 42 have been amended. No new matter has been introduced. Applicant believes the claims comply with 35 U.S.C. § 112.

Applicant notes that although claims 4 and 16 recite similar features, claim 4 depends from claim 3, while claim 16 depends from claim 1. Therefore, claims 4 and 16 are different in scope.

Claims 1-8, 16-21, 23-33, and 37-42

Claims 1-8, 16-21, 23-33, and 37-42 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Eldreth (US 6,292,800).

Applicant respectfully submits that independent claim 1 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a storage system coupled to each of the application system and the database system, the storage system including a shared volume that can be accessed by the application system via a path between the storage system and the application system and by the database system via a path between the storage system and the database system, the shared volume storing results from queries made to the database system; and a return path selector coupled to the database system for selecting a return path over which to return the results from queries made to the database system, the return path selector selecting from among at least the first connection over the network or the path between the application system and the storage system without going through the first connection over the network.

Eldreth discloses multiple database systems for storing data needed by a single application server. Fig. 2 shows a host system 200 including multiple database systems 231-234 and application servers 201, 202. In Eldreth, there is no network connection between an application system and a database system, and a path between the application system and a storage system, such that the return path selector can select from among at least the first

connection over the network or the path between the application system and the storage system without going through the first connection over the network.

For at least the foregoing reasons, claim 1, and claims 2-8, 16, and 27 depending therefrom, are novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 17 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a storage system coupled to each of the application system and the database system, the storage system including a volume that can be accessed by the application system via a path between the storage system and the application system and by the database system via a path between the storage system and the database system; and a request path selector coupled to the application system for selecting a request path over which to send query data for requests made to the database system, the request path selector selecting from among at least the first connection over the network or the path between the application system and the storage system.

As discussed above, Eldreth fails to disclose or suggest a network connection between an application system and a database system, and a path between the application system and a storage system, such that the request path selector can select from among at least the first connection over the network or the path between the application system and the storage system.

For at least the foregoing reasons, claim 17, and claims 18-21 and 23-26 depending therefrom, are novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 28 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a storage system coupled to each of the application system and the database system, the storage system including a shared volume that can be accessed by the application system via a path between the storage system and the application system and by the database system via a path between the storage system and the database system, the shared volume storing results from queries made to the database system, wherein the gateway system includes a return path selector for selecting a return path over which to return the results from queries made to the database system, the return path selector selecting from among at least the first connection over the network or the path between the application system and the storage system.

As discussed above, Eldreth fails to disclose or suggest a network connection between an application system and a database system, and a path between the application system and a storage system, such that the return path selector can select from among at least the first connection over the network or the path between the application system and the storage system.

For at least the foregoing reasons, claim 28, and claims 29 and 38 depending therefrom, are novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 30 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a storage system coupled to each of the application system and the database system, the storage system including a volume that can be accessed by the application system via a path between the storage system and the application system and by the database system via a path between the storage system and the database system, wherein the database access system includes a request path selector for selecting a request path over which to send data for queries made to the database system, the request path selector selecting from among at least the first connection over the network or the path between the application system and the storage system.

As discussed above, Eldreth fails to disclose or suggest a network connection between an application system and a database system, and a path between the application system and a storage system, such that the request path selector can select from among at least the first connection over the network or the path between the application system and the storage system.

For at least the foregoing reasons, claim 30 is novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 31 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a storage system coupled to the switch, the storage system including a shared volume that can be accessed by the application system via a path between the storage system and the application system via the switch and by the database system via a path between the storage system and the database system via the switch, the shared volume storing results from queries made to

the database system; and a return path selector coupled to the database system for selecting a return path over which to return the results from queries made to the database system, the return path selector selecting from among at least the communications network connection and the path between the storage system and the application system via the switch.

As discussed above, Eldreth fails to disclose or suggest a network connection between an application system and a database system, and a path between the application system and a storage system, such that the return path selector can select from among at least the first connection over the network or the path between the application system and the storage system.

For at least the foregoing reasons, claim 31, and claim 32 depending therefrom, are novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 33 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest a query provider and a database system being each coupled to a storage system via different paths, and a method of returning results to the query provider comprising storing results from queries made to the database system in the storage system at an address which can be accessed separately by the query provider and by the database system, and sending the address of the results via the first connection over the network to the query provider.

As discussed above, Eldreth fails to disclose or suggest a network connection between a query provider and a database system, where the query provider and the database system are each coupled to a storage system via different paths. Eldreth further fails to teach or suggest storing results from queries made to the database system in the storage system at an address which can be accessed separately by the query provider and by the database system, and sending the address of the results via the first connection over the network to the query provider.

For at least the foregoing reasons, claim 33, and claim 37, 39, and 40 depending therefrom, are novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 41 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest storing the

results of execution of queries in a storage area that the database system and the application system can access separately via separate connections to the storage area; and sending, in response to a request from the application system, the results of execution of queries to the application system over the network.

As discussed above, Eldreth fails to disclose or suggest a network connection between a query provider and a database system. Eldreth further fails to teach or suggest storing the results of execution of queries in a storage area that the database system and the application system can access separately via separate connections to the storage area; and sending the results of execution of queries to the application system over the network.

For at least the foregoing reasons, claim 41 is novel and patentable over Eldreth.

Applicant respectfully submits that independent claim 42 is novel and patentable over Eldreth because, for instance, Eldreth does not teach or suggest storing a result of execution of the query in a shared volume of the data storage system that can be accessed by the application system and by the database system; and obtaining at the application system, the result of execution of the query from the storage system via the second connection without going through the first connection over the network.

As discussed above, Eldreth fails to disclose or suggest a network connection between a query provider and a database system. Eldreth further fails to teach or suggest storing a result of execution of the query in a shared volume of the data storage system that can be accessed by the application system and by the database system; and obtaining at the application system, the result of execution of the query from the storage system via the second connection without going through the first connection over the network.

For at least the foregoing reasons, claim 42 is novel and patentable over Eldreth.

#### Claims 9 and 14

Dependent claims 9 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Eldreth (US 6,292,800) in view of Luke et al. (US 6,985,956). The

Examiner Luke et al. for allegedly disclosing that the application system designates the results as used by enabling them to be erased from the storage system at a later time.

Luke et al. does not cure the deficiencies of Eldreth, in that Luke et al. also fails to teach or suggest the features as recited in claim 1 from which claims 9 and 14 depend, namely, a storage system coupled to each of the application system and the database system, the storage system including a shared volume that can be accessed by the application system via a path between the storage system and the application system and by the database system via a path between the storage system and the database system, the shared volume storing results from queries made to the database system; and a return path selector coupled to the database system for selecting a return path over which to return the results from queries made to the database system, the return path selector selecting from among at least the first connection over the network or the path between the application system and the storage system without going through the first connection over the network.

Claims 11-13, 22, and 34-36

Dependent claims 11-13, 22, and 34-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Eldreth (US 6,292,800) in view of Dar et al. (US 2003/0154236). The Examiner Dar et al. for allegedly disclosing that the file has associated therewith a key and the key is used to control access to the results.

Dar et al. does not cure the deficiencies of Eldreth, in that Dar et al. also fails to teach or suggest the features of claim 1 from which claims 11-13 depend, the features of claim 17 from which claim 22 depends, and the features of claim 33 from which claims 34-36 depend, as described above.

Claim 43

Dependent claim 43 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Eldreth (US 6,292,800) in view of Garimella et al. (US 2005/0015415). The Examiner Luke et al. for allegedly disclosing that the application system designates the results as used by enabling them to be erased from the storage system at a later time.

Garimella et al. does not cure the deficiencies of Eldreth, in that Garimella et al. also fails to teach or suggest the features as recited in claim 42 from which claim 43

Appl. No.: 10/630,595  
Amdt. dated: June 26, 2006  
Reply to Office Action of: March 27, 2006

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depends, namely, storing a result of execution of the query in a shared volume of the data storage system that can be accessed by the application system and by the database system; and obtaining at the application system, the result of execution of the query from the storage system via the second connection without going through the first connection over the network.

### CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



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